

March 7, 2025

Re: *Milton v. Rehman et al.*, Case No. 19-cv-2770-JLR-OTW (S.D.N.Y.)

Via ECF

The Honorable Ona T. Wang  
United States Magistrate Judge, Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Dear Judge Wang:

Plaintiff submits this letter pursuant to the Court's Individual Practices in Civil Cases, Rule IV(a).

In connection with Plaintiff's Memorandum in Opposition to Defendants' Motion for Summary Judgment, Plaintiff respectfully requests permission to file certain documents under seal or in redacted form based on Defendants' designation of Attorneys' Eyes Only ("AEO") information or based on confidential personal information about Plaintiff including his birthdate and certain photographs ("PII"). The documents are listed below.

Document Name	Seal/Redact	Reason for Redactions/Sealing
Plaintiff's Response to Defendant's Statement of Material Facts and Plaintiff's Additional Material Facts Pursuant to Local Rule 56.1	Redacted	Defendants' AEO information
Ex. 1 (Report of Dr. Bhushan S. Agharkar)	Redacted	Plaintiff's PII
Ex. 3 (Transcript of the May 24, 2023 deposition of Saad Rehman)	Redacted	Defendants' AEO information
Ex. 5 (Transcript of the May 30, 2023 deposition of Pasko Delovic)	Redacted	Defendants' AEO information
Ex. 6 (Transcript of the July 18, 2023 deposition of Manuel R. Marmolejos)	Under seal	Defendants' AEO information
Ex. 7 (Transcript of the July 18, 2023 deposition of Theodore Brooks)	Redacted	Defendants' AEO information
Ex. 8 (Transcript of the May 31, 2023 deposition of Leon K. Lowe)	Redacted	Defendants' AEO information
Ex. 10 (Bureau of Prisons, Psychology Services, Intake Screening)	Redacted	Plaintiff's PII
Ex. 11 (Transcript of the March 1-8, 2017 Tier III Hearing)	Redacted	Defendants' AEO information
Ex. 14 (Copy of photographs)	Redacted	Plaintiff's PII
Ex. 15 (DOCCS Ambulatory Health Record Progress Note)	Redacted	Plaintiff's PII
Ex. 16 (DOCCS Ambulatory Health Record Progress Note)	Redacted	Plaintiff's PII
Ex. 17 (DOCCS Grievance Case History and Record)	Redacted	Plaintiff's PII
Ex. 20 (DOCCS Ambulatory Health Record Progress Note)	Redacted	Plaintiff's PII
Ex. 21 (DOCCS Use of Physical Force Directive)	Under seal	Defendants' AEO information
Ex. 26 (DOCCS Medical Prescriptions Record)	Redacted	Plaintiff's PII

Respectfully submitted,

/s/ Amelia T.R. Starr

Amelia T.R. Starr

Diane O. Lucas

Quentin J. Ullrich

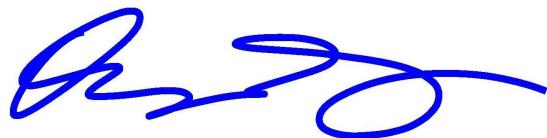
Dana Z. Horowitz

*Limited-Purpose, Pro Bono Counsel for  
Plaintiff Robert L. Milton, Jr.*

Cc: All counsel via ECF

Application **GRANTED**.

**SO ORDERED.**



Ona T. Wang  
U.S.M.J. 3/12/2025